

Southern Lights NSW
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Reference: jb:ne 211028
Enquiries: Ms J Bennett: 0428 690 935

Alisa Toomey
Senior Advisor
Australian Energy Market Commission
GPO Box 2603
Sydney NSW 2000

Dear Alisa,

**RE: Submission to the AEMC Review of the Regulatory Framework for Metering Services
(AEMC Ref: EMO0040)**

The Southern Lights Group is a consortium made up of Canberra Region Joint Organisation (CRJO), Central NSW Joint Organisation (CNSWJO), Riverina Eastern Regional Organisation of Councils (REROC), Riverina and Murray Joint Organisation (RAMJO) and Broken Hill City Council. Covering 41 Local Government Areas stretching from Bega to Broken, Southern Lights is one of the largest deployments of smart-enabled LED lighting in Australia, with over 75,000 LED streetlights being deployed across a geographic area that is approximately the size of the United Kingdom.

As part of the Southern Lights project, we have engaged with Essential Energy over the past three years on smart street lighting controls. We are well aware of the significant overseas precedent for this technology, have met directly with key overseas adopters to hear about their experience firsthand and built our own models of potential benefits. In summary, this technology has material energy, GHG, light pollution, maintenance, administrative, transparency, service level, road safety and public security benefits for councils, for utilities and for our communities.

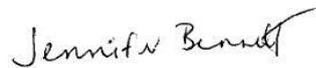
Consideration of smart street lighting controls have been made much more challenging for all parties because of a lack of clarity about whether councils will ultimately be able to benefit from dimming, trimming and constant light output (as well as whether they will be able to easily add smart city sensors to street lights). These are particularly important parts of the business case but all involve variable energy consumption that the current Type 7 metering regime was not designed to accommodate. We therefore strongly welcome the AEMC giving consideration to the inclusion of smart street lighting controls in a new smart metering regime.

We have recently been provided with a copy of the Queensland Department of Transport and Main Roads submission to the Review and are writing to unreservedly support that submission's detailed responses to the consultation questions. The DTMR submission is based on their project across Queensland's main roads but has many parallels to our own work including with respect to both the benefits that they identify and to the challenges that they highlight.

In conclusion, we fully support the AEMC introducing reforms that would enable the output of devices like smart street lighting controls to be recognised as valid metering data in the National Electricity Market.

If you require further information or clarification on comments, please do not hesitate to contact me on 0428 690 935.

Yours sincerely,



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Executive Officer, Central NSW Joint Organisation

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cc: Justin Hillier, CFO, Essential Energy